

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Revision of the Commissions' Rules to</b>	)	<b>CC Docket No. 94-102</b>
<b>Ensure Compatibility with Enhanced 911</b>	)	
<b>Emergency Calling Systems</b>	)	
	)	
<b>Phase II Compliance Deadlines for</b>	)	
<b>Non-Nationwide CMRS Carriers</b>	)	

**To: Wireless Telecommunications Bureau**

**REQUEST FOR LIMITED WAIVER AND EXTENSION  
OF THE HANDSET PENETRATION DEADLINE  
OF THE COMMISSION'S PHASE II E911 RULES**

Cellular Network Partnership, A Limited Partnership d/b/a Pioneer Cellular ("Pioneer Cellular"), by its attorneys and pursuant to 47 C.F.R. §1.925, hereby respectfully requests a limited waiver and extension of Section 20.18(g)(1)(v) of the Commission's rules regarding Phase II of Enhanced 911 ("E911") services, 47 C.F.R. §20.18(g)(1)(v), which requires Tier III carriers who employ a handset-based Phase II solution to achieve a location-capable handset penetration rate among subscribers of at least 95% by December 31, 2005.<sup>1</sup>

As set forth below, circumstances exist wherein achieving the 95% subscriber penetration requirement by the deadline is unlikely, despite Pioneer Cellular's best efforts at promoting to subscribers handsets with automatic location identification ('ALI') features. For the reasons shown herein, Pioneer Cellular requests a twelve-month extension of the penetration requirement, until December 31, 2006.

---

<sup>1</sup> Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling System, CC Docket 94-102, Order To Stay (released July 26, 2002).

## **I. Background**

Pioneer Cellular is a Cellular Radiotelephone Services licensee operating in Cellular Market Area 302 B(1) - Enid, Oklahoma MSA, and in three Rural Service Areas: 597 B(1) – Oklahoma RSA 2 - Harper, 598 B(2) – Oklahoma RSA3 - Grant, and 600 B(2) – Oklahoma RSA 5 – Roger Mills. Pioneer Cellular also holds licenses in the Personal Communications Services in Major Trading Areas 041 B2 – Oklahoma City, Oklahoma; 046 B6 – Wichita, Kansas; and 048 B2 – Tulsa, Oklahoma. Pioneer Cellular is a qualified Tier III carrier, serving fewer than 500,000 subscribers as of December 31, 2001.

Pioneer Cellular has implemented a Code Division Multiple Access (“CDMA”) digital network throughout its service area. The project was completed in the third quarter of 2003. Pioneer Cellular continues to operate a legacy TDMA/analog network technology network.

In May 2005, Pioneer Cellular concluded that deployment of a network-based E911 Phase II solution was proving to be impractical in its rural service areas. That month Pioneer Cellular filed with the FCC notification of its election to instead implement a handset-based location technology for the delivery of E911 services over the new CDMA network. Since then Pioneer Cellular has expedited implementation of the handset solution and has expended efforts to increase the penetration rate of location-capable handsets. In support of the need for an extension of the 95% penetration deadline at year’s end, the following is submitted.

## **II. Pioneer Cellular Has Demonstrated Good Faith in Complying with the E911 Requirements**

Pioneer Cellular has complied with all of the E911 requirements promulgated by the FCC, and has met E911 implementation benchmarks to which wireless licensees are subject. Pioneer Cellular began selling and activating *only* location-capable digital handsets on September 30, 2003. To this day, 100% of all new digital handsets activated on Pioneer Cellular's system are location capable. Therefore Pioneer Cellular exceeded the FCC's benchmark dates for deployment of ALI-capable phones.<sup>2</sup> Nevertheless, Pioneer Cellular foresees a serious challenge in assuring that penetration of location capable handsets among Pioneer Cellular's subscribers will reach ninety-five percent no later than December 31, 2005.

Pioneer Cellular's full-scale CDMA network deployment has prompted subscribers to gradually adopt personal equipment upgrades. Pioneer Cellular has engaged in targeted activities to encourage subscribers with TDMA and analog handsets to convert to handsets that are compatible with the CDMA system and the Phase II data delivery system.

Targeted promotional campaigns began in January 2004 to market new handsets, all of which were ALI-capable. Aggressive campaigns have been conducted since then to encourage subscribers to acquire the ALI-capable handsets. The campaigns offer phones on a buy-one-get-one-free basis, and existing subscribers are offered new handsets with the signing of a new service agreement. Promotions for phones with camera features have proved useful because many customers will upgrade for photo capability. Free phones have been offered with the purchase of an accessory.

---

<sup>2</sup> Tier III carriers using handset-based Phase II solutions were required to begin offering ALI-capable handsets by September 1, 2003. By November 30, 2003, 25% of handset activations were to be of ALI-capable phones; by May 31, 2004, 50% of activations were to be of ALI-capable phones, and by November 30, 2004, 100% of activations were to be of ALI-capable phones.

Free phone offers directed to TDMA and analog customers have been accompanied by free minutes, text messaging, accessories and service commitments. Phone purchase incentives have included free \$50 American Express gift cards and, more recently, \$40 gas cards.

Generic promotions are conducted with the intent to entice existing customers into visiting one of Pioneer Cellular's retail stores where, of course, only location-capable phones are sold. Once existing TDMA and analog customers are in the stores, representatives proactively sell the benefits of CDMA and request migration to a new CDMA phone.

Pioneer Cellular's promotional campaigns have been conducted in print ads, by direct mail, by billing inserts and on the radio. Special offers are also posted on the carriers' web site and by signage on premises. Samples of Pioneer Cellular's advertisements and promotional announcements are included herewith. None of the samples overtly advertises as a feature of the new phones their location assistance capabilities in the event of emergency because PSAPs in the subscriber service area have not, until just now, become Phase II capable.

### **III. Pioneer Cellular Has a History of Compliance with Requests from PSAPs for E911 Services**

A total of seventy-seven Public Safety Answering Points ("PSAPs") are located within Pioneer Cellular's wireless service area. Only two PSAPs have requested Phase II E911 services, and both are in the process of becoming capable of receiving and processing Phase II data. Pioneer Cellular is fulfilling the two PSAPs' requests in a timely manner, and is presently testing the functions and processes with the PSAPs. Pioneer Cellular utilizes the services of Intrado to install and test the equipment necessary to transmit E911 data to PSAPs. Intrado coordinates with the PSAPs, operates the location database and optimizes E911 performance on Pioneer Cellular's

CDMA network system.

Pioneer Cellular maintains a dialogue with the PSAPs in its service area and with the Statewide Wireless E911 Coordinator. Safety officials are aware of the ongoing transition of Pioneer Cellular's subscriber base, and that handset conversion will proceed over a period of time. The PSAPs have expressed no objection or concern with the penetration schedule. In light of the slower than anticipated pace of conversion of subscribers in purchasing new location-capable handsets, Pioneer Cellular requests specific relief from the penetration deadline of December 31, 2005.

#### **IV. The Public Interest Would Be Served by Waiver of the Penetration Deadline**

Grant of a limited waiver to Pioneer Cellular of 47 C.F.R. §20.18(g)(1)(v) would serve the public interest. An extension through December 31, 2006, of the penetration deadline is warranted given the unique facts and circumstances of Pioneer Cellular's position. As set forth in Section 106(a) of the Act, the Commission is to grant a waiver to Tier III carriers "if strict enforcement of the 95% subscriber penetration requirements would result in consumers having decreased access to emergency services."<sup>3</sup> Indeed, Pioneer Cellular's subscribers would be denied access to Phase II E911 services if Pioneer Cellular is required to deactivate existing service, or reduce construction activities because its service does not comply with FCC rules.

If not granted a waiver, Pioneer Cellular would be in the position of having to cease or reduce operations to avoid enforcement action, or expend resources to convert to a network-based solution in order to avoid handset-based liability. Neither is a practical solution. The network-based location

---

<sup>3</sup> In December 2004, Congress enacted the Ensuring Needed Help Arrives Near Callers Employing 911 Act of 2004 (*Enhance 911 Act*). The *Enhance 911 Act* directed the Commission to grant qualified Tier III carriers' requests for relief of the December 31, 2005 ninety-five percent penetration deadline for location-capable handsets, as set forth in Section 20.18(g)(1)(v) of the Commission's Rules, if "strict enforcement of the requirements of that section would result in consumers having decreased access to emergency services."

system would not work well in Pioneer Cellular's rural service area. Due to wide spacing, the cells would not properly triangulate to achieve required Phase II accuracy. If not granted a waiver, Pioneer Cellular would have to deactivate the TDMA and analog systems, which would take away cellular coverage from persons who depend upon those communications services, and who rely upon their legacy TDMA and analog phones for safety and for elementary contact with other persons. Many of those persons are located in the most isolated, rural services areas, and on remote farmland included within Pioneer Cellular's service area. Without their TDMA and 3-watt analog phones, the customers would be unable to place calls, including calls to 911 for basic and Phase I emergency services.

These alternatives to waiver would invariably result in consumers having "decreased access to emergency services," particularly in sparsely populated areas where the challenge is most formidable in assuring that the CDMA signal is as strong as the TDMA and analog signals. Because enforcement of the 95% deadline could have the unintended consequence of forcing Pioneer Cellular to shut down its TDMA and analog networks and deprive subscribers of basic 911 services, or to switch to a less reliable, network-based Phase II solution, Pioneer Cellular requests review under the *Enhance 911 Act* waiver standard.

In general, furthermore, a waiver is appropriate whenever special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.<sup>4</sup> The Commission has established standards to be used when acting upon requests for a waiver of E911

---

<sup>4</sup> 47 C.F.R. § 1.3; *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D. C. Cir. 1990) (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D. C. Cir. 1969)).

Commission has established standards to be used when acting upon requests for a waiver of E911 deadlines and obligations.<sup>5</sup> The Commission has held that it will grant waiver requests that are specific, focused, and limited in scope, with a clear path to full compliance.<sup>6</sup> The Commission has stated that carriers should undertake concrete steps necessary to come as close as possible to full compliance and should document their efforts aimed at compliance in support of any waiver request.<sup>7</sup> As set forth below, Pioneer Cellular meets the Commission's standards in that the circumstances underlying the request, in sum, present a special case that justifies a limited E911 Phase II waiver and extension.

**V. Pioneer Cellular Has a Plan  
for Compliance with the 95% Penetration Benchmark**

As stated, 100% of digital handsets that are newly activated on Pioneer Cellular's system are ALI-capable. At the beginning of the ALI program in September 2003, almost zero of the activated handsets on Pioneer Cellular's system were ALI-capable. By the end of September 2005, the penetration of ALI-capable handsets had risen to 74%. Thus the penetration rate has been increasing by about 3% per month, as demonstrated on the attached chart. Over the same two-year period, the number of TDMA handsets decreased from 25,000 to 6,037; the number of analog units decreased from 7,799 to 3,807. This improvement represents considerable good faith progress by Pioneer Cellular to convince subscribers to exchange old handsets for new, ALI-capable handsets. This is a

---

<sup>5</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Fourth Memorandum Opinion and Order, 15 FCC Rcd 17442, 17457-58, paras. 43-44 (2000) (*E911 Fourth Memorandum Opinion and Order*).

<sup>6</sup> *E911 Fourth Memorandum Opinion and Order*, 15 FCC Rcd at 17458, para. 44.

<sup>7</sup> *Id*

phones because the phones are more dependable, operate in a larger range, and are already programmed with favorite phone numbers and customized features.

Pioneer Cellular anticipates that about 81% of its subscribers will have ALI-capable handsets by December 31, 2005. Nonetheless, conversion of the next 14% of handsets is expected to be a more challenging process due to the various factors described herein, including customer resistance to change. Progress is being made, but at current conversion rates, 95% penetration cannot be assured before December 31, 2005.

Pioneer Cellular believes it will be able to meet the 95% subscriber penetration requirement by December 31, 2006, because of seasonal patterns of phone exchange in the holiday periods, and because customers will become aware that the Commission's analog cellular service requirement sunsets on February 18, 2008. That event will likely provide an incentive for some analog customers to upgrade their handsets, particularly those who desire to roam into markets where analog signal will be no longer available. On the other hand, many analog and TDMA handset users will refuse to convert until Pioneer Cellular is able to build out its CDMA network to provide the signal strength and quality as it now provides via TDMA and analog, or until Pioneer Cellular disables the TDMA and analog signals. Subscribers who reside or travel in the most rural parts of the cellular service area will be the last to switch to ALI-capable handsets. In service to those customers, and because of the wide open spaces traveled within the wireless service area, Pioneer Cellular will likely offer TDMA and analog services well into the future.

In keeping with FCC rules and policy, Pioneer Cellular will maintain its policy of selling and activating only ALI-capable digital handsets. It will continue to conduct marketing campaigns to encourage consumer adoption of new handsets. Pioneer Cellular will also continue to augment its



CDMA network facilities and provide Phase II E911 services and other coordination services to the local PSAPs. However, given the rural character of Pioneer Cellular's market and the reliance by local subscribers upon TDMA and analog phones and service, it is necessary for Pioneer Cellular to respectfully request grant of a waiver of the 95% penetration requirement.

### **Conclusion**

Based on the foregoing reasons, grant of a limited waiver of the Commission's Phase II E911 rules will serve the public interest. Accordingly, Pioneer Cellular requests a temporary waiver and extension of time, through December 31, 2006, to achieve a location-capable handset penetration rate among subscribers of at least 95%. The public interest benefit in this case equals or exceeds that which the Commission has found in other instances to be sufficient for waiver, and the request meets the standards of the *Enhance 911 Act*. Therefore Pioneer Cellular requests that a limited waiver and extension of Section 20.18(g)(1)(v) of FCC Rules be granted as proposed.

Respectfully submitted,

**Cellular Network Partnership,  
A Limited Partnership  
d/b/a Pioneer Cellular**

A handwritten signature in black ink, appearing to read "David L. Nace", written over a horizontal line.

David L. Nace  
Pamela L. Gist  
Its Attorneys

Lukas, Nace, Gutierrez & Sachs, Chartered  
1650 Tysons Boulevard, Suite 1500  
McLean, Virginia 22102  
(703) 584-8678  
November 4, 2005

**Pioneer Cellular**

**Samples of Marketing of Location-Capable Handsets**



THIRD DEGREE ADVERTISING

100 East Main, Suite 200 Oklahoma City, OK 73104 (405) 235-3020

## RADIO SCRIPT

job number: PIONEER-54-04  
client: Pioneer Communications  
description: :60 Radio "The Weather with Chuck Weatherly"  
date: January 3, 2004

VOICE/MUSIC DIRECTION

VOICE

*sfx: Subtle outside noise. Voice tweaked slightly to sound patched in.*

**DIANE NEWSINGTON:** ...and now it's time for **The Weather** with our weatherman on the street, Chuck Weatherly. How's the weather, Chuck?

**CHUCK WEATHERLY:** It's a beautiful day out here, Diane, with a 100 percent chance of **minutes!**

**DIANE NEWSINGTON:** I'm sorry, Chuck, did you say **minutes**?

**CHUCK WEATHERLY:** That's right, Diane! With the new plan from Pioneer Enid Cellular, it's **raining minutes!** For as little as \$44.95 a month for 12 months, folks can get **2,000 minutes a month!**

**DIANE NEWSINGTON:** That sure is a lot of minutes, Chuck.

**CHUCK WEATHERLY:** One **heck** of a lot of minutes, Diane! You also get the data plan **free** for one month as well as 500 **free mobile-to-mobile minutes!**

**DIANE NEWSINGTON:** Chuck, I'm getting reports of a **free phone** with the purchase of an accessory while supplies last, can you confirm that?

**CHUCK WEATHERLY:** I sure can, Diane. And right now, when you sign up for Pioneer's Cell-U-Care coverage, you get a **free umbrella!**

(chuckling)

**DIANE NEWSINGTON:** I'll bet that'll come in handy with all those **raining minutes**, right, Chuck?

(chuckling also)

**CHUCK WEATHERLY:** That's right, Diane.

**CHUCK WEATHERLY:** Stop by your local office or call **1-800-641-2732** for more information today! Pioneer Enid Cellular. **High-Tech Communications with Everyday Smarts.**

Print - 2nd quarter, 2004

## What It Means To Be **FREE**.

There are two kinds of "FREE" in the world. There's the kind where you get nothing, like "fat-free." But then there's the kind of FREE where you get something. For FREE. That's the best kind of FREE. The kind you find at Pioneer/Enid Cellular when you sign up for one of their plans. Get free stuff and the freedom to choose the plan that's best for you.

- **FREE CALLER I.D.**
- **FREE CALL WAITING**
- **FREE VOICE MAIL**
- **FREE 3-WAY CALLING**

### **PLUS** CHOOSE 2 of the following for more FREE options:

- 5,000 Nights and Weekend Minutes per month
- 5,000 Mobile to Mobile Minutes per month
- 1,000 Text Messages per month
- 500 Bonus Anytime Boomerang Minutes (minutes carry over your first month)



1205 Main • Woodward, OK • 580.256.2355  
800.641.2732 • [www.pioneerenidcellular.com](http://www.pioneerenidcellular.com)

Visit Pioneer/Enid Cellular at your Pioneer Telephone office in Mooreland, Shattuck or Sealing.

Limited time offer. Other conditions and restrictions apply. Requires credit approval. Early termination fee of \$25 per remaining month. Coverage is not available in all areas. Airtime and other usage is rounded up. Boomerang carry over minutes expire after 12 months, immediately upon default or if customer changes rate plans and applies to plans of \$44.95. Unused minutes are not redeemable for cash or credit and are not transferable. Nights and Weekend and Mobile to Mobile minutes do not carry over and apply in true home system only. See coverage map and restrictions at [www.pioneerenidcellular.com](http://www.pioneerenidcellular.com)

Woodward 5.75 in. x 5 in.



THIRD DEGREE ADVERTISING

100 East Main, Suite 200 Oklahoma City, OK 73104 (405) 235-3020

3<sup>rd</sup> quarter, 2004

## RADIO SCRIPT

job number: PIONEER-03-04  
client: Pioneer Communications  
description: :60 Radio "Pioneer Double Play"  
date: June 29, 2004

### VOICE/MUSIC DIRECTION

**BOB & DAVE:** Traditional baseball radio commentators - their voices are enhanced to give them the sound of being in the press box at a live baseball game. Bob talks fast since he's doing the play-by-play. Dave is as enthusiastic, even more so, but is more conversational in his timing - though he still is at a higher level of projection since he's ostensibly "on-air" throughout

### VOICE

**sfx:** Baseball crowd noise (not major league loud, but substantial)

**BOB:** ...and Robinson hits it hard down the third base line! Mitchell catches it and throws it to Costello on second! The runner's out! A **great double play!**

**DAVE:** Wanna hear about **another** great double play, Bob? The **Pioneer Enid Cellular Double Play!** Two phones with **two** individual numbers for as low as \$44.94 a month!

**BOB:** That's some deal, Dave! Kramer's up to the plate next. He's having quite a year...batting **500** for the season.

**DAVE:** You'll get **500 free** mobile-to-mobile minutes with the plan, Bob. You can **share** your plan minutes, your text messaging package **and** your night and weekend minutes, too! Plus, you can add three more phones to your "roster" for only \$9.99 each per month!

**sfx:** Crack of bat hitting ball. Crowd cheering louder.

**BOB:** Kramer does it again, **shooting** a line drive **straight** into right field!

**DAVE:** You can count on Pioneer to **shoot straight**, Bob. They've been the "home team" in Western Oklahoma for over **fifty years**, with a **true commitment** to local service!

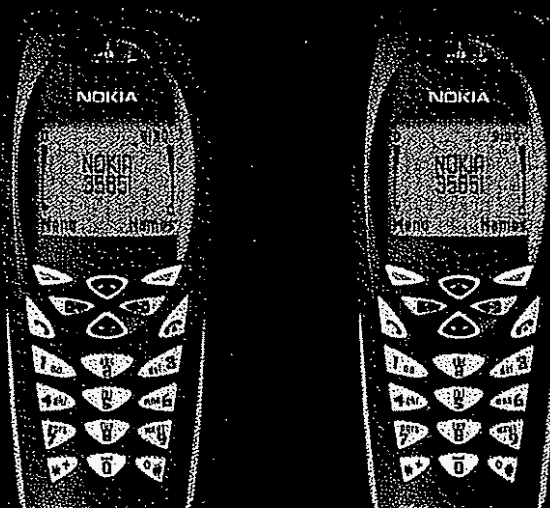
**BOB:** Time for the seventh-inning stretch, Dave — and a great time to stretch on over to **Pioneer Enid Cellular** to find out more about this great deal!

**DAVE:** Good call, Bob.

Pioneer Enid Cellular. **High-Tech** Communications with **Everyday** Smarts.

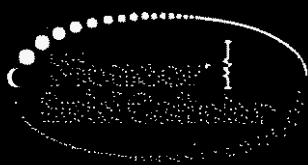
Limited Time Offer

Buy 1...Get 1 **FREE**



2 phones for only \$29.00!\*

**PLUS,** get carry-over  
minutes on our new  
Boomerang plans



\*Phone may not be actual model shown



Pioneer/Enid Cellular  
P.O. Box 539  
Kingfisher, OK 73750

PRST STD  
US POSTAGE  
PAID  
PERMIT # 1289  
OKLA CITY OK

3rd gtu  
2004

# PIONEER DOUBLE PLAY!

## TWO PHONES. TWO NUMBERS.

PIONEER, OUR POLICY IS TO KEEP THINGS  
RIGHT AND SIMPLE, AND WE'VE GOT A NEW  
Simplified Offer THAT'S A TRUE WINNER!

Free Mobile-To-Mobile, Nights & Weekends,  
plan minutes

Free text messaging package

Monthly plan as low as \$44.94 per month with  
purchase of two phones

Add up to three phones  
for only  
**\$9.99**  
each per month.  
(From a grand slam  
total of five phones!)

Featured Phones	Two Phones for	Value of
Motorola LG400	\$39.00	\$250.00
LG 4400	\$89.00	\$378.00
Motorola LG400	\$89.00	\$380.00

is the straight talk of the deal.  
Offer is available now through  
November 30, 2004 to new or  
existing customers upon signing  
a 24-month service agreement.  
Just subscribe to a Partner  
and purchase two phones.



### SWITCHING IS EASY.

You can even keep your same phone  
number so stop by your local Pioneer  
office or call 1-800-641-2732.

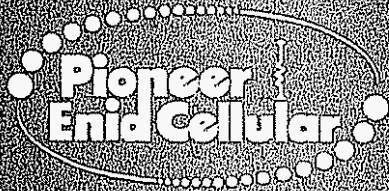
### Tech Communications with Everyday Smarts

Plans of more than \$44.95 allow customers to carry over unused minutes for a period of 12 months. Nights and weekends and mobile-  
minutes do not carry over and apply in true home system only. Phones must be billed to the same account, subscribe to and agree to a  
service commitment on each phone with a \$25 per remaining month early termination fee. An activation charge of \$25 applies. See specific  
conditions at [www.pioneerendcellular.com](http://www.pioneerendcellular.com) or call 1-800-641-2732.

Pioneer/Enid Cellular  
P.O. Box 539  
Kingfisher, OK 73750



# WE'VE GOT ALL YOUR BASES COVERED



Monthly plan as low as

**\$44.94**

with purchase of  
two phones

500 FREE

**PIONEER DOUBLE PLAY!**  
**TWO PHONES. TWO NUMBERS.**



3<sup>rd</sup> quarter, 2004

Alva-8.625x10 7/2/04 8:26 AM Page 1

# WE'VE GOT ALL YOUR BASES COVERED.

## PIONEER DOUBLE PLAY! TWO PHONES. TWO NUMBERS.



A plan as low as  
**\$44.99**  
per month

**500 FREE**  
minutes to 3rd party numbers

AT PIONEER, OUR POLICY IS TO KEEP THINGS STRAIGHT AND SIMPLE, AND WE'VE GOT A NEW SIMPLIFIED OFFER THAT'S A TRUE WINNER!

- Shared plan minutes
- Shared text messaging package
- Shared Mobile-To-Mobile minutes
- Shared Nights & Weekend minutes
- Plus, FREE Caller ID, Call Waiting & 3-Way Calling!
- add up to 3 more phones for only \$9.99 each per month (for a grand-slam total of 5 phones!)

Here's the straight talk of the deal. The offer is available now through September 30, 2004 to new or upgrading customers upon signing a new, 24-month service agreement. You must subscribe to a Partner Plan and purchase two phones - we're featuring the Motorola 343 at a special rate of 2 for only \$39.00!

Assumes plan of more than \$44.99. Offer is subject to 12 month. Plan(s) and service(s) and service to be used in the U.S. and Canada only. Call and text phones must be used in the U.S. and Canada. Includes Partner plan and 500 minutes to 3rd party numbers. See actual plan for details. Offer is subject to change. See time, date, terms and conditions at [www.pioneeridcellular.com](http://www.pioneeridcellular.com) or call 1-800-641-2732.



1205 Main - Woodward, OK  
580-256-2355  
800-641-2732  
[www.pioneeridcellular.com](http://www.pioneeridcellular.com)

Visit Pioneer Enid Cellular  
at your Pioneer Telephone Office.



High-Tech Communications with Everyday Smarts



However, plans of more than \$44.95 allow customers to carry over unused minutes for a period of 12 months. Nights and weekends and mobile-to-mobile minutes do not carry over and apply in the home system only. "Pioneer" phones must be billed to the same account, subscribe in and agree to a 24-month service commitment on each phone with a \$20 per remaining month early termination fee. An activation charge of \$25 applies. "Choose two" offer requires a \$44.95 monthly plan minimum and a 24-month commitment. Other restrictions may apply. See specific terms and conditions at [www.ptci.com](http://www.ptci.com) or call 1-800-641-2732.

High-Tech Communications with Everyday Smarts



Buy-one-get-one offer available on other models. See store for details on 822 W. Randolph - Enid, OK 3601 W. Owen K. Garriott - Enid, OK 580 237 2355 800 641 2732 [www.ptci.com](http://www.ptci.com) Visit Pioneer / Enid Cellular at your Pioneer Telephone office

**FREE!** Savings up to \$369.00

## THE PIONEER PICTURE-PERFECT PLAN!

Buy one phone and get a second phone

And we've got a great new offer, just in time for the holidays!

Pioneer's new BREW™-enabled camera phones allow you to download, install and run a variety of entertaining and informative applications, including ringtones, games, news and more! We give you a quick, inexpensive way to send a moment to share with the ones you love.

UNIQUE MOMENTS IN LIFE ARE ALWAYS MADE MORE SPECIAL WHEN YOU CAN SHARE IT WITH OTHERS - AND PIONEER/ENID CELLULAR MAKES IT THAT MUCH EASIER WITH OUR NEW CAMERA PHONES AND DATA PACKAGES!

WITH A CAMERA PHONE FROM PIONEER/ENID CELLULAR!

# SEND THE MOMENT NOW YOU CAN



\*Second phone of equal or lesser value

Plus, add TWO of the following FREE:
• One Free Partner Plan
• Double anytime minutes for your first month
• 5,000 mobile-to-mobile minutes package
• 3,000 nights and weekends package
• 1,000 text messages
• 10 Mg data package
Save up to \$19.98 per month!

4th gr, 2004 Parent



THIRD DEGREE ADVERTISING

100 East Main, Suite 200 Oklahoma City, OK 73104 (405) 235-3020

## RADIO SCRIPT

job number: PIONEER-32-04  
client: Pioneer Communications  
description: :60 Radio "Sweet Potatoes"  
date: September 29, 2004

### VOICE/MUSIC DIRECTION

### VOICE

*(heard from a distance, then struggling to wrestle phone from baby's grasp)*

*(exhausted)*

*(Wife's attitude is slightly snarky - she's dealt with the crazy kid many times and now it's his turn)*

*sfx: silverware being thrown about*

*sfx: Cell phone ring*

**BABY:** *(Baby talk & giggling)*

**HUSBAND:** Hey buddy! Please...give...daddy...the phone!

**WIFE:** Honey? Are you there?

**HUSBAND:** I'm here now. I guess you got the picture I sent with my new camera phone?

**WIFE:** Sure did! I guess you're having a little...trouble...with Little Man over there, huh?

**HUSBAND:** You could say that.

**BABY:** *(Chaos & giggling)*

**WIFE:** I like how you wrote "HELP ME" in sweet potatoes across the tabletop.

**HUSBAND:** Well, it wasn't in his bowl anymore, I had to do something with it.

**WIFE:** You do know he's **allergic** to sweet potatoes, right?

**HUSBAND:** Oh, I know it now...

**BABY:** *(Giggles & burps)*

**ANNOUNCER:** Some moments are made to be shared, and now Pioneer Enid Cellular lets you "**send the moment**," with our new BREW™-enabled camera phones! And with the Pioneer **Picture-Perfect** Plan, buy one phone and get the second phone **free**! And that's just the **beginning** of the savings! Switching is easy, and you can keep your same number!

Products and services that are right for you — that's **the Pioneer Way**! Stop by your local office or call **1-800-641-2732** for more information today!

*(sheepish)*

**HUSBAND:** So...are you coming home soon?

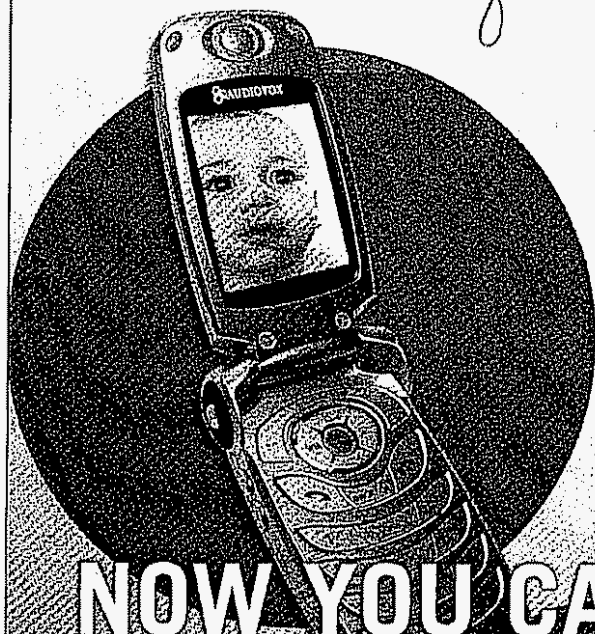
**WIFE:** Send me a picture of a clean baby and I'll think about it.

*sfx: silverware being thrown about*

**BABY:** *(Chaos & giggles)*

**ANNOUNCER:** Pioneer Enid Cellular. **High-Tech** Communications with **Everyday Smarts**.

4<sup>th</sup> qtr, 2004 print



# NOW YOU CAN SEND THE MOMENT

WITH A CAMERA PHONE FROM PIONEER/ENID CELLULAR!

UNIQUE MOMENTS IN LIFE ARE ALWAYS MADE MORE SPECIAL WHEN YOU CAN SHARE IT WITH OTHERS - AND PIONEER/ENID CELLULAR MAKES IT THAT MUCH EASIER WITH OUR NEW CAMERA PHONES AND DATA PACKAGES!

Pioneer's new BREW™-enabled camera phones allow you to download, install and run a variety of entertaining and informative applications, including ringtones, games, news and more! We give you a quick, inexpensive way to send a moment to share with the ones you love.

And we've got a great new offer, just in time for the holidays!

## THE PIONEER PICTURE-PERFECT PLAN!

Buy one phone and get a second phone **FREE!**

Plus, add TWO of the following FREE:

- One Free Partner Plan
- Double anytime minutes for your first month
- 5,000 mobile-to-mobile minutes package
- 3,000 nights and weekends package
- 1,000 text messages
- 10 Mg data package

Save up to \$19.98 per month!

\*Second phone of equal or lesser value

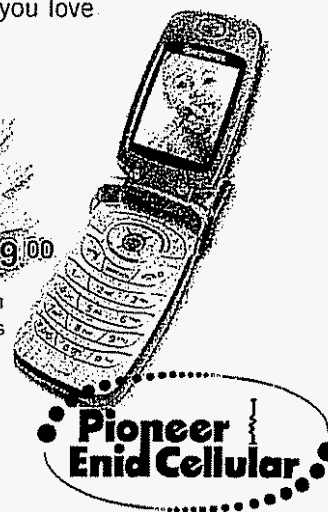
Savings up to \$369.00

Buy-one-get-one offer available on other models. See store for details.

822 W. Randolph - Enid, OK  
3501 W. Owen K. Garriott - Enid, OK  
580 237 2355  
800 641 2732

[www.ptci.com](http://www.ptci.com)

Visit Pioneer / Enid Cellular  
at your Pioneer Telephone office



High-Tech Communications with Everyday Smarts

Roaming plans of more than \$44.95 allow customers to carry over unused minutes for a period of 12 months. Nights and weekends and mobile-to-mobile minutes do not carry over and apply in true home systems only. \*Partner\* phones must be billed to the same account, subscribe to and agree to a 24-month service commitment on each phone with a \$25 per remaining month early termination fee. An activation charge of \$25 applies. "Choose two" offer requires a \$44.95 monthly plan minimum and a 24-month commitment. Other restrictions may apply. See specific terms and conditions at [www.ptci.com](http://www.ptci.com) or call 1-800-641-2732.

1st qtr - 2005



**2000**  
TOTAL MINUTES

FOR AS LITTLE AS  
**\$44.95**

\$44.95 PACKAGE INCLUDES:  
500 ANYTIME MINUTES  
1000 NIGHTS & WEEKENDS MINUTES  
500 BONUS MINUTES

**YOU CAN TALK UP A STORM WITH THE NEW PLAN FROM PIONEER/ENID CELLULAR!**

Wireless minutes are always in season, and right now, you can get 2000 minutes a month for as little as \$44.95!

That's a whole lot of minutes!

**PLUS, RECEIVE:**

- Free data plan for one month
- 500 free mobile-to-mobile minutes per month

**SWITCHING IS EASY.**

You can even keep your same phone number so stop by your local Pioneer office or call 1-800-641-2732.

314 N. 5th - Kingfisher, OK

405-375-2355

800-641-2732

Visit Pioneer/Enid Cellular at your Pioneer Telephone office in Canton.

[www.pcl.com](http://www.pcl.com)



High-Tech Communications with Everyday Smarts



**FREE PHONE**

Nokia 6015i or Motorola 343 with the purchase of an accessory

Offer expires 2/3/05. Models regularly priced at \$39 will be included with this promotion, while supplies last. Subscribers on Discounting plans of more than \$44.95 per month receive 500 BONUS anytime minutes for 12 months with a 2 month service commitment. Free Data Plan for one month only. Unused minutes are not refundable for cash, credit or transfer. Carry over of BONUS minutes and anytime minutes apply on plans of more than \$44.95 per month and expire after 12 months immediately upon credit (including non-payment of account) or if a customer changes rate plans. Pick 2 promotion applies for the life of the contract. Anytime minutes apply with applicable Discounting plan only and do not apply with a contract. Mobile and weekends and mobile-to-mobile minutes do not carry over and apply in true home system only. Usage is rounded up to the next full minute. Service not available in all areas. Free phone is a Nokia 6015i or Motorola 343. Phone models may vary. Other restrictions may apply. Go to [www.pcl.com](http://www.pcl.com) for specific terms and conditions.





DELIVERY ADDRESS FOR ALL MATERIAL: DeLong Mailing Service, 601 S. Robinson, OKC, OK 73109

## **PIONEER TELEPHONE**

Cellular Upgrade

Qty: 6,338

Standard A Regular Letter Mail

### **Services Include:**

- ✓ Inkjet Addressing
- ✓ CASS Certifying and Barcoding of list

Mail Processing	\$257.57
Estimated Postage	\$1,153.52
<b>Total Cost →→</b>	<b>\$1,411.09</b>

Drop 1: 2/1/05      Analog Mail  
 Drop 2: 2/8/05      TDMA Mail 1  
 Drop 3: 2/15/05     TDMA Mail 2

Estimates are valid for 30 days. Estimates are based on information provided by the customer, and are subject to change if there is any variance in the material, processing requirements or list.

Postage is estimated and I understand postage must be paid in advance unless arrangements have been made with the Credit Department. I also understand that I will pay the estimated amount of postage and will be billed or credited the difference in the estimated postage and the actual postage.

I understand that The Oklahoman Direct does not have control over the United States Postal Service and their rates, nor the ability to manipulate the USPS rates. The Oklahoman Direct will make every effort to ensure that my mail receives the lowest possible rates for my type and class of mail.

I understand that The Oklahoman Direct accepts no liability and has no control over the processing, handling or delivery schedule of the USPS and cannot guarantee when mail will be delivered by the USPS.

Liability shall be limited to the value of the work performed. Postage, materials and/or printing will not be refunded. Any claim for allowance must be made within 10 business days of occurrence of error.

Material provided by the customer will be verified by the container / box until time permits for weigh counting. Mail processing involves spoilage and The Oklahoman Direct will make every effort to minimize the spoilage. Depending on quantity, spoilage may vary from 1-10%.

Mailing lists, unless otherwise specified, are rented for one time use only. Multi-use lists are available upon request for an additional charge. It is a federal offense to use a one-time use list multiple times. By signing this agreement I understand that copying or reusing a one-time use list is a felony and legal action will be taken. Furthermore, I understand that by loaning or leasing the list to a third party, I assume all liabilities including financial and legal responsibility of that third party. It is therefore recommended that I have a similar contract if I am not the end consumer.

All artwork must be presented in an approved format. The Oklahoman Direct has the capability to convert files to acceptable formats and will do so with the customers approval at an applicable rate. This must be completed before the file can be delivered to the printer. I am aware that this could cause a delay in processing my mail.

I understand that the normal processing time is 3-5 business days. I also understand that this time does not start until all material, lists, postage funds and a signed quote are received by The Oklahoman Direct. I also understand that my projected mail date, as well as projected in-home date, will be affected by the late delivery of my material, lists, postage funds and/or signed quote.

Without prior arrangement, material will be discarded 5 days after the mail date.

I have read and agree to the terms listed above.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **2<sup>nd</sup> Q Marketing Campaign - Cellular**

### **Part Two - Analog/TDMA Upgrade to CDMA**

**Start Date:** April 1 through June 30, 2005

**Promotion Code:** \* 031 \*

**Target Group:** Existing customers with Analog or TDMA phones

**Offer:**

- Free CDMA \$39.00 phone and accessory i.e. cigarette lighter adapter (car kits excluded)
- Free Bonus Minutes (250 bonus minutes on \$34.95 plan and 500 bonus minutes on plans of more than \$44.95 per month)
- Free 10 MG data plan for one month
- Pick 2 from the following:
  - Partner Plan
  - Double Airtime first month
  - 5,000 Mobile-to-Mobile minutes plan
  - 3,000 nights and weekends plan
  - 1,000 text messaging plan

**Notes:**

- Customers can purchase higher end phone at established sales price – no additional discounts apply

**Restrictions:**

- Offer good to analog or TDMA upgrading customer only
- Customer must turn in their old phone
- 24-month service commitment on phone & plan

- Bonus minutes package applies for 12 months
- Minutes accumulate on plans of \$44.95 or more per month
  - > Pick 2 applies for life of contract

**Campaign tactics:**

Direct mail to customer on old plans that have not upgraded since the first series of direct mails.

- 1) Analog - June 1st
- 2) TDMA - 1/2 June 3rd
- 3) TDMA - 1/2 June 7th

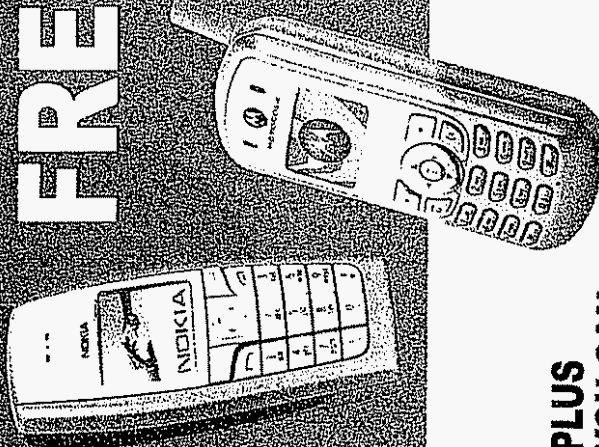
Hurry! Money saving offer ends SOON!  
added to direct mail.

- > This piece as been mailed once - this is the second mailing.
- > Offer expires June 30, 2005

Quit Mail 2/1/05 to 2/15/05 front  
a 6/1/05, 6/3/05 & 6/7/05

# FREE Phone, Accessory & More!

PLUS, FREE Bonus Anytime Minutes\*  
and FREE Data Plan!\*\*



**PLUS  
YOU CAN**

**PICK TWO FREE**

- PARTNER PLAN
- DOUBLE AIRTIME FIRST MONTH
- 5000 MOBILE TO MOBILE MINUTES PLAN
- 3000 NIGHTS & WEEKENDS MINUTES PLAN
- 1000 TEXT MESSAGES PLAN

Stop by your local Pioneer/Enid Cellular office  
today to take advantage of this great offer!



High-Tech Communications With Everyday Smarts

Limited time offer expires 6/30/05 for Pioneer/Enid Cellular customers upgrading from analog or TDMA digital phones to CDMA digital phones to a Boomerang plan. \*Subscribers on Boomerang plans of more than \$44.95 receive 500 BONUS anytime minutes and \$34.95 plans receive 250 BONUS anytime minutes for 12 months with a 24-month service commitment. \*\*Free Data Plan for one month only. Unused minutes are not redeemable for cash, credit or transfer. Can be used for mobile-to-mobile minutes only. Offer applies to the life of the contract. Offer is not valid on accessories priced at \$25 or less. Promotion applies for the life of the contract. Nights and weekends mobile-to-mobile minutes do not carry over and apply in true home system only. Usage is rounded up to the next full minute. Service not available in all areas. Go to [www.ptci.com](http://www.ptci.com) for specific terms and conditions. Free phone is a Nokia 6015i or Motorola 343. Phone models may vary. Free accessory offer valid on accessories priced at \$25 or less.

1-800-641-2732 [www.ptci.com](http://www.ptci.com)

822 W. Randolph, Enid 3501 W. Owen K. Garriott, Enid

314 N. 5th, Kingfisher 1205 Main, Woodward



*Back*

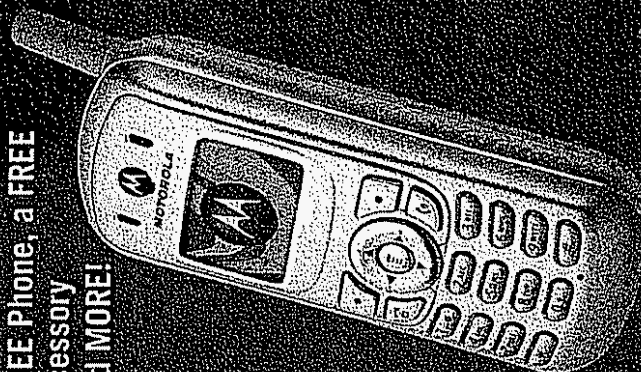
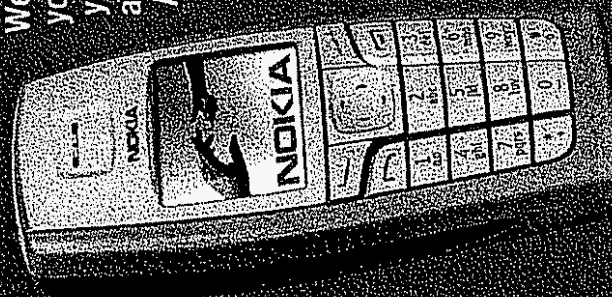


Pioneer/Enid Cellular  
P.O. Box 539  
Kingfisher, OK 73750

PRST STD  
US POSTAGE  
PAID  
PERMIT # 1  
OKLA CITY OK 731

**Now is a great time to upgrade  
your Pioneer/Enid cellular  
phone and service!**

We value loyal customers like  
you! That's why we're offering  
you - for a limited time -  
a FREE Phone, a FREE  
Accessory  
and MORE!



See details on other side  
to claim your FREE stuff!



DELIVERY ADDRESS FOR ALL MATERIAL: DeLong Mailing Service, 601 S. Robinson, OKC, OK 73109

## **PIONEER TELEPHONE**

*Cellular Upgrade*

Qty: 6,338

*Standard A Regular Letter Mail*

### **Services Include:**

- ✓ Inkjet Addressing
- ✓ CASS Certifying and Barcoding of list

Mail Processing	\$257.57
Estimated Postage	\$1,153.52
<b>Total Cost →→</b>	<b>\$1,411.09</b>

**Drop 1: 2/1/05**

**Analog Mail**

**Drop 2: 2/8/05**

**TDMA Mail 1**

**Drop 3: 2/15/05**

**TDMA Mail 2**

Estimates are valid for 30 days. Estimates are based on information provided by the customer, and are subject to change if there is any variance in the material, processing requirements or list.

Postage is estimated and I understand postage must be paid in advance unless arrangements have been made with the Credit Department. I also understand that I will pay the estimated amount of postage and will be billed or credited the difference in the estimated postage and the actual postage.

I understand that The Oklahoman Direct does not have control over the United States Postal Service and their rates, nor the ability to manipulate the USPS rates. The Oklahoman Direct will make every effort to ensure that my mail receives the lowest possible rates for my type and class of mail.

I understand that The Oklahoman Direct accepts no liability and has no control over the processing, handling or delivery schedule of the USPS and cannot guarantee when mail will be delivered by the USPS.

Liability shall be limited to the value of the work performed. Postage, materials and/or printing will not be refunded. Any claim for allowance must be made within 10 business days of occurrence of error.

Material provided by the customer will be verified by the container / box until time permits for weigh counting. Mail processing involves spoilage and The Oklahoman Direct will make every effort to minimize the spoilage. Depending on quantity, spoilage may vary from 1-10%.

Mailing lists, unless otherwise specified, are rented for one time use only. Multi-use lists are available upon request for an additional charge. It is a federal offense to use a one-time use list multiple times. By signing this agreement I understand that copying or reusing a one-time use list is a felony and legal action will be taken. Furthermore, I understand that by loaning or leasing the list to a third party, I assume all liabilities including financial and legal responsibility of that third party. It is therefore recommended that I have a similar contract if I am not the end consumer.

All artwork must be presented in an approved format. The Oklahoman Direct has the capability to convert files to acceptable formats and will do so with the customers approval at an applicable rate. This must be completed before the file can be delivered to the printer. I am aware that this could cause a delay in processing my mail.

I understand that the normal processing time is 3-5 business days. I also understand that this time does not start until all material, lists, postage funds and a signed quote are received by The Oklahoman Direct. I also understand that my projected mail date, as well as projected in-home date, will be affected by the late delivery of my material, lists, postage funds and/or signed quote.

Without prior arrangement, material will be discarded 5 days after the mail date.

I have read and agree to the terms listed above.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



# Melissa A Direct Mail Estimate Request

Date: 3/8/05  
Contact Name: Janice  
LOB: Cellular  
Description:  
Remarket TDMA/Analog  
Direct Mail postcard:  
Post Cards are at Oklahoman Direct  
Pioneer will send address list

*request list from  
mis in May  
send now 4/5/05*

Mail Qty: Information No available  
until list is generated

Mail Dates: See special instructions

Number of Mail Drops: 3

Desired in home dates: See special instructions

Print Qty: N/A

Oklahoman Direct has inventory

☐ First Class Basic

☐ First Class Presorted

☐ Third Class Regular Bulk

## Mail Processing:

Data: ☐ ☒ PTC list

Insert into: ☐ #10 ☒ 6"x9" ☐ 9"x12" ☐ Other: \_\_\_\_\_

Tab: ☐ Once ☐ Twice ☐ Other: \_\_\_\_\_

## Special Instructions:

PTC will send two mailing lists: Analog and TDMA Customers

Please mail Analog first with in home date of June 1<sup>st</sup>

Second list TDMA divide into two drops with in home dates of June 3<sup>rd</sup> and 7<sup>th</sup>

Please use special line in BLUE - Hurry!!! Money Saving Offer Ends SOON!

## Tracking Information for Marla

Requested Date: 3/4/05 from Melissa at Oklahoma Direct 475-3849

Received Information ☐ Requested PO ☐

*request in 4/6/05 / ms.*



Account Name

Account No.

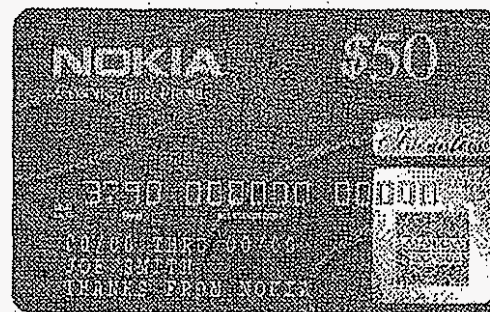
Bill Date

**Purchase a Nokia 6255i phone from Pioneer Cellular for only \$99 and an accessory - receive a \$50 American Express mail-in rebate Gift Card from Nokia**

**BUY THIS** →



**GET THIS** →



**Stop by any Pioneer Cellular office for details!**

[www.ptci.com](http://www.ptci.com)

**1.800.641.2732**

Offer good April 22, 2005 through June 3, 2005

certain restrictions apply

pg 2  
may 5, 2005



Cellular

Payment due upon receipt.

Account Number	
Bill Date	
Amount Due	
Past Due After	

fax / bill

### Planning that special vacation?

*Stop by Pioneer Cellular - we can help capture the memories!*

- Camera Phones
- Buy one phone - get one FREE!
- Text Messaging
- Bonus Anytime Minutes
- Family Plans
- Mobile-to-Mobile Plans



**Stay in touch - no matter where you travel!**

1.800.641.2732 [www.ptci.com](http://www.ptci.com)



Cellular

Charge To:  
☐ MasterCard  
☐ Visa  
☐ Discover  
☐ AmEx

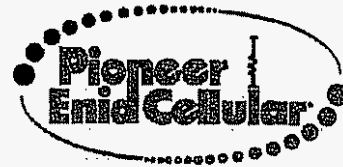
Card Number: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Bill Date	Account Number	Past Due After	Amount Due	Amount Paid

pg 1  
May 5, 2005



Payment due upon receipt.

Account Number	
Bill Date	
Amount Due	
Past Due After	

*Large bill*  
*Billing Inserts*  
*Apr-May 2005*

## BUY ONE PHONE/GET ONE FREE!

**Nokia 6015**

New or upgrading customers (without service commitment)

- Bonus Airtime – 500 anytime minutes on plans of \$44.95 or more per month
- Bonus Airtime – 250 anytime minutes on plans of \$34.95 per month
- FREE 5,000 Mobile-to-Mobile plan OR One Partner Plan

[www.ptci.com](http://www.ptci.com)

1.800.641.2732

offer expires June 30, 2005

certain restrictions apply



Charge To:  
☐ MasterCard  
☐ Visa  
☐ Discover  
☐ AmEx

Card Number: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Bill Date	Account Number	Past Due After	Amount Due	Amount Paid

*pg1 - Wireless April 05*

## **2<sup>nd</sup> Q Marketing Campaign - Cellular**

### **Part One**

**Start Date:** April 1 through June 30, 2005

**Promotion code:** \* 45 \*

**Target Group:** New and upgrading (out of commitment) customers in cellular coverage area (northwest Oklahoma)

**Offer:**

- Bonus Airtime – 500 anytime minutes on plans of \$44.95 or more per month
- Bonus Airtime – 250 anytime minutes on plans of \$34.95 per month
- FREE 5,000 Mobile-to-Mobile plan **OR** one Partner plan
- Buy one phone get one FREE – Available on Nokia 6015
  
- 25% off accessories (excludes car kits) Mother's and Father's Day offers

**Notes:**

- Offers apply to new or existing customers without service commitment
- Nokia 6019 will be substituted when supply of 6015 is depleted
- Customer may select either 5,000 Mobile-To-Mobile minute plan OR one FREE Partner plan. Both are included for 12 months.



**Plus:**

Phone pricing as follows:

- \$39 – Nokia 6015 (6019 when supplies end)
- \$49 – Motorola 262
- \$59 – Nokia 3205 or 6225 camera phone
- \$69 – Kyocera Slider
  
- \$79 – LG 4400
- \$89 – Audiovox 8910 camera phone
- \$99 – Nokia 6255i camera phone
- \$119– Motorola 810 camera phones
- \$159– Motorola 710 camera phones  
with Bluetooth headset

**Restrictions:**

- 24-month service commitment applies on phone & plans
- Bonus minutes are added each month for 12 months
- Unused Bonus anytime minutes will be added to carry over minutes on plans of more than \$44.95 per month
- "Buy one - get one free" promotion applies to \$39 phones – no additional discounts apply to higher end phones.
- "Buy one – get one free" offer requires subscription to Partner plan and both must be billed to the same account.

**Campaign tactics:**

- Direct Mail – foreign Alva, Enid, Fairview and Woodward
- Newspaper advertising
- Radio advertising
- Bill Insert – Cellular and PTC customers (cellular area only)



{5T09 e(XN)}

**BUY ONE PHONE FOR \$39  
AND GET ONE FREE!**

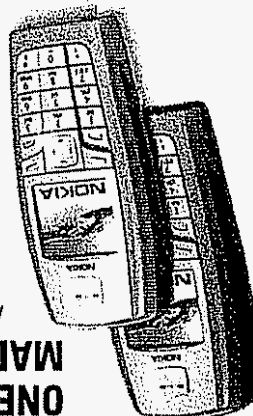
Get a second phone tree!

Share 600 Anytime minutes plus 500 Nights & Weekend minutes for only \$34.95 a month! That's 550 minutes each! And you can easily share those minutes when you buy one phone and

## the Partner Plan

As children, we were all taught the importance of sharing. Now Pioneer Cellular gives you the opportunity to make Mom proud when you share your minutes with

**ONE GREAT OFFER,  
MADE WITH TWO IN MIND!**



## High-Tech Communications with Everyday Smarts



**Pioneer**  
Cellular

# SHARE THE LOVE!

1100 MINUTES A MONTH FOR JUST \$34.95 PLUS, BUY ONE PHONE, GET ONE FREE!

2nd Quarter 2005



**GET 'ROUND**  
ON A **FULL TANK!**

**BUY A NOKIA 6255i  
PHONE AND ACCESSORY**



GET A **\$40** GAS  
CARD

**CALL 1.800.641.2732**

Certain restrictions apply  
Offer expires 10-03-05

**BECAUSE YOU GOTTA GET 'ROUND!**

[www.ptci.com](http://www.ptci.com)

*1/2 page bill insert  
Sep 05*

# THE OPEN ROAD CAN TAKE YOU ANYWHERE.

3rd QTR 2005  
Front



WHETHER IT'S YOUR DRIVEWAY OR THE HIGHWAY  
GET THERE WITH PIONEER CELLULAR.

**Pioneer**  
Cellular

# GO WHERE YOU WANT WITH GET 'ROUND CELLULAR PLANS



## STOP IN AND CHECK OUT OUR NEW PLANS!

- FREE First Month of Service!
- FREE Activation!
- FREE Incoming Text Messages!
- Unlimited Mobile-to-Mobile Minutes!
- Unlimited Nights and Weekend Minutes!
- Expanded Coverage Areas!

## TURN 'ROUND MINUTES:

Round used anytime minutes?  
Just turn around and use them  
the next month. FREE

**CALL 1-800-641-2732**  
**BECAUSE YOU GOTTA GET 'ROUND!**

[www.ptci.com](http://www.ptci.com)



HIGH-TECH COMMUNICATIONS  
WITH EVERYDAY SMARTS

Additional terms and conditions apply. Service not available in  
all areas. See store for details or go to [www.ptci.com](http://www.ptci.com).

Pioneer Cellular  
P.O. Box 539  
Kingfisher, OK 73750



*Wendy  
P.O. Box 539  
Kingfisher, OK 73750  
2005  
BACK*

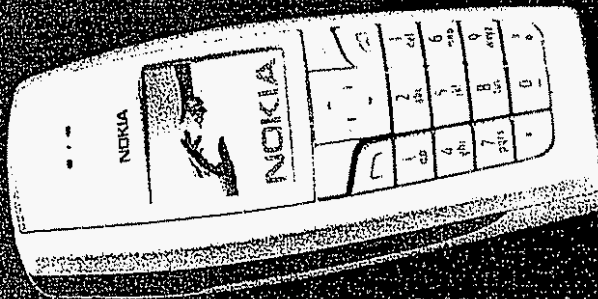
3rd QTR 2005  
- Front -  
- Mailout -

REDEEM THIS COUPON AT ANY  
PIONEER CELLULAR LOCATION

# FREE PHONE

WHEN YOU SIGN UP  
FOR A NEW ROUND  
PLAN, AND, GET ALL  
THIS TOO:

- FREE ACTIVATION!
- FREE FIRST MONTH OF SERVICE!
- FREE INCOMING TEXT MESSAGES!
- UNLIMITED MOBILE-TO-MOBILE MINUTES!
- UNLIMITED NIGHTS AND WEEKEND MINUTES!
- EXPANDED COVERAGE AREAS!



LIMITED-TIME OFFER. STOP  
BY YOUR LOCAL PIONEER  
CELLULAR LOCATION TODAY!



Limited time offer requires upgrade for Pioneer Cellular customers upgrading from a value or T-Mobile digital phone to a CDMA phone and subscription to a Round plan. 24-month service commitment required. Go to [www.pcd.com](http://www.pcd.com) for specific terms and conditions. Free phone is a Nokia 6030. Phone models may vary. Best prepaid coupon to get free phone offer. Customer must first be a higher price or T-Mobile phone to receive free phone offer. Unlimited Mobile-to-Mobile and nights and weekend minutes apply per plan at \$25.99 or more per month.



## THE OPEN ROAD CAN TAKE YOU ANYWHERE.

WHETHER IT'S YOUR DRIVEWAY OR THE HIGHWAY  
GET THERE WITH THE NEW ROUND PLANS FROM  
PIONEER CELLULAR!

PLUS, USE THIS COUPON TO GET A FREE PHONE!

# GO WHERE YOU WANT WITH **GET 'ROUND** CELLULAR PLANS



- **FREE** Nokia 6019i PHONE WITH COUPON!
- **FREE** ACTIVATION!
- **FREE** FIRST MONTH OF SERVICE!
- **FREE** INCOMING TEXT MESSAGES!
- **UNLIMITED** MOBILE-TO-MOBILE MINUTES!
- **UNLIMITED** NIGHTS AND WEEKEND MINUTES!
- **EXPANDED** COVERAGE AREAS!

**STOP BY YOUR LOCAL PIONEER  
CELLULAR OFFICE TODAY!**

**BECAUSE YOU GOTTA GET 'ROUND  
AND A FREE PHONE!**

**HIGH-TECH COMMUNICATIONS WITH EVERYDAY SMARTS**

Limited time offer expires 9/30/05 for Pioneer Cellular customers upgrading from analog or TDMA digital phones to CDMA phones and subscribing to a Round plan. 21 month service commitment required. Unused minutes are not redeemable for cash, credit or transfer. Go to [www.ptci.com](http://www.ptci.com) for specific terms and conditions. \*Free phone is a Nokia 6019i. Phone models may vary. Must present coupon to get free phone offer. Customer must turn in his/her analog or TDMA phone to receive free phone offer. Unlimited Mobile-to-Mobile and Nights and Weekend minutes.



[www.ptci.com](http://www.ptci.com)

Pioneer Cellular  
P.O. Box 539  
Kingfisher, OK 73750



*3rd Q. 2005  
MAIL-OUT  
-BACK-*



### **3<sup>rd</sup> Quarter Marketing Campaign – Cellular Analog/TDMA Upgrade to CDMA**

**Start Date:** July 1 – September 30, 2005

**Promotion Code:** None

**Target Group:** Existing cellular customers who still have analog or TDMA phones

**Offer:**

- Free activation (use #0542)
- Free first month access on plans of \$36.95 or more per month (use #0542)
- Instant \$ 39 rebate on CDMA phone of customer's choice (coupon required)

**Notes:** Offer good for existing analog and TDMA cellular customers only. A 24-month service commitment is required for all plans and phones. Customer must redeem coupon to receive \$ 39 instant rebate. Customers must turn in their analog or TDMA phone to receive offer.

**Phone Pricing:** Phone pricing same as on previous page.

**Marketing Tactics:** Direct mailer to current analog and TDMA cellular customers – mailer will include a coupon that must be redeemed at a Pioneer Business or Cellular Office to receive the \$ 39 instant phone rebate

### 3<sup>rd</sup> Quarter Marketing Campaign – Cellular

**Start Date:** July 1 – September 30, 2005

**Promotion Code:** \*054\*

**Target Group:** New and upgrading customers in cellular coverage areas (including northwest Oklahoma and Crescent)  
(including Analog/TDMA Upgrade to CDMA)

**Offer:**

- Free activation
- Free first month access on plans of \$36.95 or more per month

**Notes:** Offer good for new and existing cellular customers. A 24-month service commitment is required for all plans and phones. We will use this opportunity to promote our new cellular plans and rates.

**Phone Pricing:** Phone pricing is as follows:

- \$ 39 – Nokia 6019
- \$ 39 – Nokia 3205 or 6225 camera phone
- \$ 49 – Motorola 262
- \$ 49 – Kyocera Slider
- \$ 89 – Audiovox 8910 camera phone
- \$ 99 – Nokia 6255i camera phone
- \$119 – Motorola 810
- \$159 – Motorola 710 with Bluetooth headset

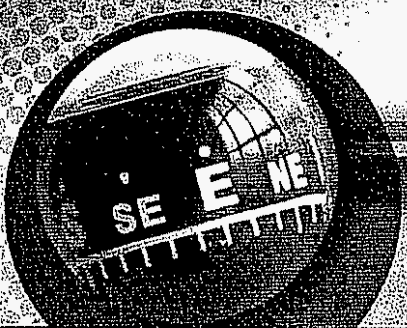
**Marketing Tactics:**

- Direct mailer to non-cellular customers in foreign areas (Alva, Enid, Woodward and Fairview)
- Direct mailer to existing cellular customers
- Newspaper advertising
- Radio advertising
- Bill insert to cellular and PTC cellular customers
- Web promotion



3rd qtr 2005 Print

# THE OPEN ROAD CAN TAKE YOU ANYWHERE.



## GO WHERE YOU WANT WITH **GET 'ROUND** CELLULAR PLANS

### TURN 'ROUND MINUTES:

Got unused Anytime minutes?  
Just turn-around and use them  
the next month - FREE

\*For a period of 12 months



### STOP IN AND CHECK OUT OUR NEW PLANS TODAY!

- FREE First Month of Service!
- FREE Activation!
- FREE Incoming Text Messages!
- Unlimited Mobile-to-Mobile Minutes!
- Unlimited Nights and Weekend Minutes!
- Expanded Coverage Areas!

## CALL 1-800-641-2732

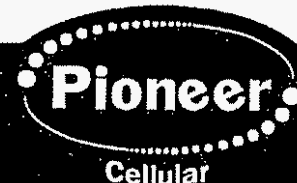
### BECAUSE YOU GOTTA GET 'ROUND!

#### SWITCHING IS EASY.

You can even keep your same phone  
number! So stop by your local Pioneer  
office or call 1-800-641-2732.

1205 Main - Woodward, OK  
580-256-2355  
800-641-2732

Visit Pioneer Cellular  
at your local Pioneer Telephone office.



HIGH-TECH COMMUNICATIONS  
WITH EVERYDAY SMARTS.

[www.ptci.com](http://www.ptci.com)

Offer good through September 30, 2005. Subscribers on 'Round plans of more than \$49.95 per month receive unlimited Mobile-to-Mobile and Nights and Weekend minutes. Turn 'Round anytime minutes apply on plans of more than \$49.95 per month and expire after 12 months. Immediately upon default (including non-payment of account) or if a customer changes rate plans, unused anytime minutes are not redeemable for cash, credit or transfer. Usage is rounded up to the next full minute. 24-month commitment required. Service not available in all areas. Other restrictions may apply. See [www.ptci.com](http://www.ptci.com) for terms and conditions.

THE COVERAGE  
THE MINUTES  
THE PLANS  
THAT GET YOU THERE.

# CHECK OUT PIONEER'S

# GET 'ROUND

## CELLULAR PLANS

**750 ANYTIME MINUTES**  
FOR AS LITTLE AS **\$36.95** PER MONTH

**Got unused Anytime minutes?  
Just turn around and use them  
for the next month\*\* — FREE**

- Ⓢ FREE FIRST MONTH OF SERVICE!
- Ⓢ FREE ACTIVATION!
- Ⓢ FREE INCOMING TEXT MESSAGES!
- Ⓢ UNLIMITED MOBILE-TO-MOBILE MINUTES!\*
- Ⓢ UNLIMITED NIGHTS AND WEEKEND MINUTES!\*
- Ⓢ EXPANDED COVERAGE AREAS!

**BECAUSE YOU GOTTA GET 'ROUND!**

**CALL 1-800-641-2732**

**SWITCHING IS EASY.**  
You can even keep your same phone number! So stop by your local Pioneer office or call 1-800-541-2732.

514 N. 5th - Kingfisher, OK  
405-375-2355  
800-641-2732



**Pioneer**  
Cellular

**HIGH-TECH COMMUNICATIONS  
WITH EVERYDAY SMARTS.**

After good through September 30, 2001. \*Subscribers on Round plans of more than \$6.99 per month receive unlimited Mobile-to-Mobile and MMS and Textual minutes. \*\*All Round anytime minutes apply on plans of more than \$45.99 per month and expire after 12 months, are strictly local calls or landline non-payment of toll calls or if a customer's service is not active. (Round anytime minutes are not available for chat, text or voice). Usage is rounded up to the next full minute. 24-month commitment required. Service will auto bill in all areas. Other restrictions apply. See our website for more details.



THIRD DEGREE ADVERTISING

100 East Main, Suite 200 Oklahoma City, OK 73104 (405) 235-3020

3<sup>rd</sup> - gtw 2005  
radio

## RADIO SCRIPT

job number: PIONEER-86-04  
client: Pioneer Communications  
description: :60 Radio "Notes from the Open Road — Version: B"  
date: June 21, 2004

### VOICE/MUSIC DIRECTION

*music: steel guitar - movie soundtrackish score that signifies the "open road," ala "Thelma & Louise"*

*TRAVELIN' MAN: Sam Elliott-ish, meat-eating, dream-chasing wanderer. A little gruff and prone to slightly pretentious, poetic melodrama.*

*direction: slight dramatic pause*

*direction: a little surprised*

*direction: sharp and stern - she's dealt with this many times before.....*

*direction: with a sigh of resignation*

*direction: quick offer*

*direction: quick disclaimer*

### VOICE

#### TRAVELIN' MAN:

*I chase the sun fading low on the velvet horizon as my lone traveling companion shines brightly next to me — Pioneer Cellular is its name, and it fuels my wandering spirit with the new Get 'Round Plans.*

*The Cruise 'Round Plan helps those who stay in state — close to home... while the Travel 'Round Plan covers an eight-state region in which to lose...or find, oneself.*

*The Roam 'Round Package allows the traveler to stay connected through nationwide roaming. And Pioneer lets them send text messages and pictures of their journey to loved ones back home.*

*Dusk fills the indigo sky, as the sound of...*

*sfx: Knock-knock on car window*

*TRAVELIN' MAN: ...of knocking...*

*sfx: Electric window being "rolled" down*

*NON-TRAVELING WIFE: Are you gonna sit in the minivan all night? Your meatloaf's getting cold.*

*TRAVELIN' MAN: Yes, dear.*

#### ANNOUNCER:

*You can get 'round the state, region and country right now with the Pioneer Get 'Round Plans! Plus, get expanded coverage areas, unlimited Mobile-to-Mobile minutes and Unlimited Nights and Weekend minutes! Just call 1-800-641-2732.*

*Service not available in all areas, certain restrictions may apply.*

#### TRAVELIN' MAN:

*Pioneer Cellular. High-Tech Communications with Everyday Smarts.*

*NON-TRAVELING WIFE: Larry! The meatloaf!*

## **4<sup>th</sup> Quarter Marketing Campaign – Cellular Analog/TDMA Upgrade to CDMA**

**Start Date:** October 1 – December 31, 2005

**Promotion Code:** 062

**Target Group:** Existing cellular customers who still have analog or TDMA phones

**Offer:**

- FREE activation
- FREE first month access on Cruise or Travel 'Round Plans (requires coupon)
- FREE Nokia 6019 phone (\$39 value phone or \$39 discount can be applied to a higher-end phone)
- One FREE Partner and one FREE Partner Voice Mail for THREE months

**Notes:** Offer good for existing analog and TDMA cellular customers only. A 24-month service commitment is required for all plans and phones. Customer can redeem coupon to receive first month of Cruise or Travel 'Round Plan free. Customers must turn in their analog or TDMA phone to receive offer. Customers who have multiple ACTIVE analog or TDMA phones can receive one free phone for each phone upgraded to CDMA. Offer does not apply when upgrading from a current CDMA phone.

**Phone Pricing:** Phone pricing same as on page 12.

**Marketing Tactics:** Direct mailer to current analog and TDMA cellular customers – mailer will include a coupon to be redeemed at a Pioneer Business or Cellular Office to receive first month of Cruise or Travel 'Round Plan free.



### — Phillip: Older Brother

**Pioneer Cellular**  
P.O. Box 539  
Kingfisher, OK 73750

Presorted Standard  
US Postage  
**PAID**  
Permit No. 1  
Dala, City, OK 731

A black and white photograph of a mobile phone, likely a Palm Treo, shown at an angle. The screen displays a close-up image of a tiger's face. The phone has a full QWERTY keyboard and several function buttons. The background is dark and textured.

**FREE Unlimited Incoming  
On Messages**  
**Unlimited Mobile-to-Mobile  
Minutes\*\***  
**Unlimited Nights and  
Weekend Minutes\*\***  
**Expanded Coverage Areas**  
**Picture Messaging/  
Email Plans Available**



**Pioneer**

**Cellular**  
[www.ptcj.com](http://www.ptcj.com)

[illegible]

Limited time offer expires 12/31/05 for former Cellular customers upgrading from analog or TDMA 2G dual phones to CDMA phones and switching to a Get By® plan. 26-month service commitment required. Go to [www.gbt.com](http://www.gbt.com) for specific terms and conditions. Free phone is a \$49.99 phone model only. Payment coupon is for free phone and first month free offer. Customer must live in eligible state or CDMA state to receive free phone offer. Other restrictions may apply.

1000  
900  
800  
700  
600  
500  
400  
300  
200  
100  
0

**USE THIS COUPON TO GET A FREE PHONE!**

UNIQUE MOMENTS IN LIFE ARE ALWAYS MADE MORE SPECIAL WHEN YOU CAN SHARE IT WITH OTHERS - AND PIONEER/ENID CELLULAR MAKES IT THAT MUCH EASIER WITH OUR NEW CAMERA PHONES AND DATA PACKAGES!

Pioneer's new BREW™-enabled camera phones allow you to download, install and run a variety of entertaining and informative applications, including ringtones, games, news and more! We give you a quick, inexpensive way to send a moment to share with the ones you love.

And we've got a great new offer, just in time for the holidays!

## THE PIONEER PICTURE-PERFECT PLAN!

Buy one phone and get a second phone

**FREE!**

Plus, add TWO of the following FREE:

- 100MB of text messages
- 100MB of picture messages
- 100MB of video messages
- 100MB of audio messages
- 100MB of data messages

Save up to \$19.98 per month!

\*Second phone of equal or lesser value.



### SWITCHING IS EASY.

You can even keep your same phone number so stop by your local Pioneer office or call 1-800-641-2732.

### High-Tech Communications with Everyday Smarts

Boomerang plans of more than \$44.95 allow customers to carry over unused minutes for a period of 12 months. Nights and weekends and mobile-to-mobile minutes do not carry over and apply in true home systems only. \*Partner\* phones must be billed to the same account, subscribe to and agree to a 24-month service commitment on each phone with a \$25 per remaining month early termination fee. An activation charge of \$25 applies. \*Choose two\* offer requires a \$44.95 monthly plan minimum and a 24-month commitment. Other restrictions may apply. See specific terms and conditions at [www.ptcl.com](http://www.ptcl.com) or call 1-800-641-2732.

Pioneer/Enid Cellular  
P.O. Box 539  
Kingfisher, OK 73750

Presorted Standard  
US Postage  
**PAID**  
Permit No. 1  
Okla. City, OK 731



4th Qtr  
2005

## **4<sup>th</sup> Quarter Marketing Campaign – Cellular**

**Start Date:** October 1 – December 31, 2005

**Promotion Code:** 061

**Target Group:** New and upgrading customers in cellular coverage areas (including northwest Oklahoma and Crescent)

**Offer:**

- FREE activation on any of the new Get 'Round Plans
- One FREE Partner and one FREE Partner Voice Mail for THREE months
- Buy one phone for \$39 and get a second phone FREE (\$39 value phone or \$39 discount can be applied to a higher-end phone)

**Notes:** Offer good for new and existing out-of-commitment cellular customers. A 24-month service commitment is required for all plans and phones. "Buy one get one free" offer requires plans to be billed to the same account. Current out-of-commitment customers who switch to a new plan are eligible for this offer. Additional Partner phones are available at regular rates. Employees are eligible for the buy-one-get-one-free phone offer, but are **not** eligible for an additional free Partner and Partner Voice Mail offer.

**Phone Pricing:** Phone pricing is as follows:

- \$ 39 – Nokia 6019
- \$ 49 – Motorola 262
- \$ 89 – Audiovox 8910 camera phone
- \$ 99 – Nokia 6255i camera phone, LG6100
- \$119 – Motorola 810 camera phone
- \$159 – Motorola 710 camera phone with Bluetooth headset
- \$185 – Kyocera Aircard

**Marketing Tactics:**

- Direct mailer to non-cellular customers including foreign areas (Alva, Enid, Woodward and Fairview)
- Newspaper advertising
- Radio advertising
- Bill insert
- Web promotion
- Office signage

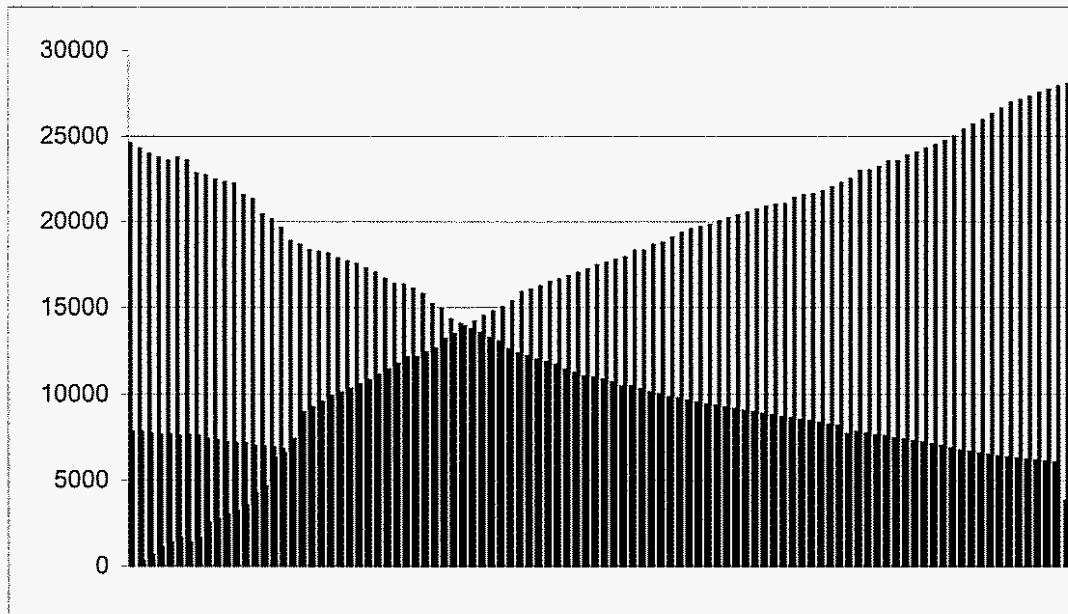




**Pioneer Cellular**

**Location-Capable Handset Penetration Rates**

Chart show change of technology (Since Sept 1, 03)

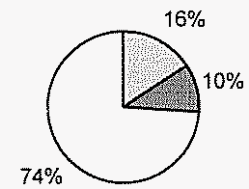


CDMA E911 ready phones increase from 0 to almost 75%

TDMA shows decrease from 25,000 units to 6,037

Analog down from 7,799 to 3,807 a decrease of almost 24%

Percentage of Current Technology



CDMA =74%

TDMA = 16%

Analog = 10 %

**Declaration of**

**Richard A. Ruhl, Manager  
Cellular Network Partnership, A Limited Partnership  
d/b/a Pioneer Cellular**

## DECLARATION

I, Richard A. Ruhl, hereby state and declare:

1. I am General Manager of Cellular Network Partnership, A Limited Partnership d/b/a Pioneer Cellular, a wireless telecommunications services operator and the Petitioner herein.

2. I am familiar with the facts contained in the foregoing "Request For Limited Waiver And Extension Of The Handset Penetration Deadline Of The Commission's Phase II E911 Rules" and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4<sup>th</sup> day of November, 2005

  
\_\_\_\_\_  
Richard A. Ruhl  
General Manager